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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MUHAMMED ABDULLAH, as an
individual, and on behalf of all others
similarly situated,

Plaintiff,

v.

U.S. SECURITY ASSOCIATES, INC., a
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 2:09-cv-09554-PSG (Ex)

(Los Angeles Superior Court BC405465)

Hon. Judge Philip S. Gutierrez
Room 6A

**JOINT STIPULATION AMENDING
DEADLINE TO FILE MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

1 Plaintiffs and Defendant U.S. Security Associates, Inc. (“U.S. Security”)
2 (Plaintiffs with U.S. Security, collectively the “Parties”) hereby stipulate and agree,
3 to extend the deadline for the Parties to file a motion for preliminary approval of
4 class action settlement by an additional twenty-one (21) days, as follows:

5 1. On December 27, 2016, the Court issued a Minute Order (the “Minute
6 Order”) setting a deadline of February 13, 2017, for the Parties to file a motion for
7 preliminary approval of class action settlement (Doc. #166).

8 2. On February 16, 2017, the Court issued an Order extending the deadline
9 for the Parties to file a motion for preliminary approval of class action settlement
10 until March 6, 2017 (Doc. #174).

11 3. Following the Court’s February 16th Order, as the Parties were working
12 on the motion for preliminary approval of class action settlement, they discovered
13 that there were several points that needed further resolution.

14 4. The Parties have been actively working to resolve these remaining
15 issues and believe they can reach common ground and finalize the motion for
16 preliminary approval of class action settlement.

17 5. To complete the motion for preliminary approval of class action
18 settlement, the Parties request a short extension of twenty-one (21) days up to and
19 including March 27, 2017, to file it with the Court.

20 6. This stipulation is not made for purposes of delay and no party will be
21 prejudiced by the granting of this stipulation.

22 For these reasons, Plaintiffs and Defendant U.S. Security jointly stipulate to
23 extend the deadline established in the February 16, 2017 Order (Doc. #174) for the

24 ///

26 ///

28 ///

1 Parties to file a motion for preliminary approval of class action settlement by
2 twenty-one (21) days, up to and including March 27, 2017.

3 Dated: March 6, 2017

BRYAN CAVE LLP

Julie E. Patterson

Brian A. Sher

Mariangela M. Seale

By: /s/ Julie E. Patterson

Julie E. Patterson

Attorneys for Defendant

U.S. SECURITY ASSOCIATES, INC.

11 Dated: March 6, 2017

MARLIN & SALTZMAN LLP

Stanley D. Saltzman

By: /s/ Stanley D. Saltzman

Stanley D. Saltzman

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PROOF OF SERVICE

CCP 1013a(3) Revised 5/1/88

(USDC – Central - 2:09-CV-09554-PSG-(EX) – Abdullah v. USSA)

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is: 3161 Michelson Drive, Suite 1500, Irvine, CA 92612-4414.

On March 6, 2017, I caused the following document(s) described as:

**JOINT STIPULATION AMENDING DEADLINE TO FILE MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SUIT**

to be served on all interested parties in this action as follows:

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☒ CM/ECF NOTICE OF ELECTRONIC FILING: I caused said document(s) to be served by means of this Court's electronic transmission of the Notice of Electronic filing through the Court's transmission facilities, to the parties and/or counsel who are registered CM/ECF Users set forth in the service list obtained from this Court.

☒ FEDERAL - I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on March 6, 2017, at Irvine, California.

/s/ Julie E. Patterson

Julie E. Patterson

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